

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INSULATORS AND ASBESTOS WORKERS)		
LOCAL NO. 14 PENSION FUND,)		
Derivatively On Behalf Of 3M Company,)		Civil Action No. 07-416 (GMS)
)	
Plaintiff,)		
)	
v.)		
)	
GEORGE W. BUCKLEY, LINDA G.)		
ALVARADO, VANCE D. COFFMAN,)		
MICHAEL L. ESKEW, W. JAMES FARRELL,)		
HERBERT L. HENKEL, EDWARD M.)		
LIDDY, ROBERT S. MORRISON, AULANA)		
L. PETERS, ROZANNE L. RIDGEWAY,)		
PATRICK D. CAMPBELL, MOE S. NOZARI,)		
FREDERICK J. PALENSKY, RICHARD F.)		
ZIEGLER,)		
)	
Defendants,)		
)	
and)		
)	
3M COMPANY, a Delaware Corporation,)		
)	
Nominal Defendant.)		

MOTION TO DISMISS THE COMPLAINT

Defendants George W. Buckley, Patrick D. Campbell, Moe S. Nozari, Frederick J. Palensky, Richard F. Ziegler (the "Officer Defendants") hereby move the Court pursuant to Fed. R. Civ. P. 12(b)(6) and the Private Litigation Securities Reform Act of 1995 ("PSLRA"), 15 U.S.C. § 78u-4(b) for an order dismissing Plaintiff's Complaint.


This Motion is based upon the accompanying Opening Brief in Support of Defendants' Motion to Dismiss the Complaint and upon the papers, records and pleadings on file with this Court in this case.

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Dated: September 10, 2007
817928

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CERTIFICATE OF SERVICE

I, Philip A. Rovner, hereby certify that on September 10, 2007, the within document was filed with the Clerk of the Court using CM/ECF which will send notification of such filing(s) to the following; that the document was served on the following counsel as indicated; and that the document is available for viewing and downloading from CM/ECF.

BY HAND DELIVERY

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Nominal Defendant.)	

[PROPOSED] ORDER

The Court having considered the Motion of Defendants to Dismiss the Complaint pursuant to Fed. R. Civ. P. 12(b)(6) and the Private Litigation Securities Reform Act of 1995 and any opposition thereto; now, therefore,

IT IS THIS HEREBY ORDERED THAT Defendants' motion is GRANTED and Plaintiff's Complaint is DISMISSED, with prejudice.

United States District Judge

Dated: _____